

**IN THE UNITED STATES COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

LEEANNA SCHROEDER

Defendant.

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NO. 18-00293-CR-W-DGK

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Comes now Defendant Leeanna Schroeder, by and through her counsel Cynthia M. Dodge, and hereby requests this Court enter an order modifying the current bond conditions by releasing Ms. Schroeder from a third-party custodian and allowing her to seek separate housing. In support thereof, Defendant states as follows:

1. The Order Setting Conditions of Release [Doc. 444] was entered on February 16, 2021.
2. Defendant was released on a personal recognizance bond with a third-party custodian, Defendant's father.
3. Defendant is currently being supervised by the U.S. Pretrial Services Office in St. Louis, Missouri.
4. Defendant is fully compliant with the conditions of release, has maintained full-time employment, attended regular counseling, has reported as instructed, and is not in violation.
5. Defendant now seeks a modification of this Court's order, specifically Condition Numbers 8 and 9(b), to allow the release of said third party custodian and for Defendant to seek housing closer to her employment in the St. Louis area.

6. Defendant would like to live closer to her place of employment, maintain independence and become more self-sufficient.
7. Defendant is working full-time and can afford a place on her own, subject to prior approval by her local probation officer.
8. Defendant and counsel have consulted with Probation Officer, Amanda Polt, who has no objection allowing Ms. Schroeder to seek different housing so long as pretrial services examines and approves prior to Defendant's moving.

For the foregoing reasons Defendant requests this Court enter an order modifying her conditions of release to allow her to be released from third party custodian and seek different housing options on her own with her officer's approval.

Respectfully submitted,

/S/ CYNTHIA M. DODGE
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CERTIFICATE REGARDING SERVICE

I hereby certify that it is my belief and understanding that counsel for plaintiff, and counsel for the co-defendants in this matter are participants in the Court's CM/ECF program and that separate service of the foregoing document is not required beyond the Notification of Electronic Filing to be forwarded on November 16, 2021 upon the filing of the foregoing document.

/s/ Cynthia M. Dodge
CYNTHIA M. DODGE

Motion to Modify Bond Conditions

USA v. Leeanna Schroeder 18-00293

Case 4:18-cr-00293-DGK Document 527 Filed 11/17/21 Page 2 of 2